



Metis Settlements General Council

Coal Policy Consultation Committee Submission

September 2nd, 2021

Thank you for the meeting to hear our input on the province's coal policy. Your interest in our position and your commitment to representing that to government is very well received by MSGC.

Missed Opportunity

We, the eight Metis settlements, have the right to and expectation of free, prior, and informed consultation on matters that impact Metis: our people, communities and our relationship with Alberta and Canada. This did not happen when Alberta rescinded the previously existing Coal Policy on May 22nd, 2020. Nor was there any advance notice of the policy being reviewed. We consider this a missed opportunity, not only for the Metis, but for any Albertans who had an interest in this policy area.

Impact on Land set Aside for Harvesting

Metis have harvesting rights [fishing, hunting, trapping] that pre-date and take precedence over provincial coal policy. Under the current understanding of harvesting rights, Area D, one of four approved harvesting areas encompasses the foothills and the Alberta side of the national mountain parks. So, while our settlements do not have coal deposits or coal mining at present, we are concerned about the mining and downstream impacts on our traditional ability to feed our families from areas set aside for us. Several studies set out the negative impacts on wildlife and fish habitats as a result on coal development and mining.

Any policy that alters, grants mining rights, determines environmental policy, and potentially damages the wildlife we depend upon requires our agreement and permission. Like the first point we made, there was no invitation to consultation or notice that changes were being considered. Coal mine applications that were on the books [previously submitted] were granted status by the government before we were even informed of any change. Like other Indigenous communities, we hold that government to government sharing is the way forward.

When the Alberta government ignored our rights and failed to engage us in any meaningful discussion or planning about the use of these Metis hunting and fishing areas, it engenders mistrust and communicates a lack of good will at a time when both are needed. The great interest Albertans have over Indigenous issues demands that we look for reasons to be seen together, solving the challenges we face at the same time and with the same urgency.

OUR LAND. OUR CULTURE. OUR FUTURE.

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Climate Action

The extraction and burning of coal for heating and steelmaking has long been identified as a significant source of greenhouse gas pollution that contributes to climate change. Many legitimate reports say the coal industry has such a large global climate change impact that the development of new coal mines is being explicitly discouraged by the International Energy Agency. In their May 2021 report, the IEA concluded that " ...no new coal mines or mine extensions are needed in the [Net Zero Emissions future]." Global News reports "in the past three years, 23 major global insurance companies have adopted policies that end or limit insurance for the coal industry, and nine insurers have ended or limited insurance for the Canadian oilsands."

According to the Insurance Bureau of Canada, the average annual cost of claims for property damage or losses due to severe weather has more than quadrupled over the last decade to \$2.4 billion in 2020. That figure is expected to keep growing. Our residents are keenly aware of the increased cost of having insurance.

Environmental groups are also increasingly putting pressure on the insurance industry, demanding that they stop underwriting coal mines, coal-fired power plants, and other fossil fuel projects.

Our hardiness as a community depends on making sound decisions with a full understanding of direct and indirect climate change impacts. We don't live in isolation, we share in the global concern about protecting our planet, and especially our provincial backyard.

Is Coal our Asbestos?

Coal is Alberta's asbestos. Like Quebec, who struggled for years to put an end to producing asbestos, Alberta needs to turn a page on an energy source that is no longer acceptable in our own province. That others want to burn coal – therefore we should sell it to them - is like saying we should sell asbestos, even though we find it extremely damaging to health. Alberta's own building code does not tolerate any exposure to asbestos. Our AHS has stringent requirements for the removal of asbestos. The industry says we have clean coal. Clean coal is like saying safe asbestos.

Narrow Scope of Concern

The Terms of Reference make it clear that the CPCC's consultation will be very narrowly framed. The CPCC will not be able to consider the consequences of coal development for water allocations and water quality. Your committee will find it difficult to examine issues related to landscape-level planning and cumulative impacts because this too is outside the scope of your work.

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Concern for more than just coal

An Alberta study showed selenium concentrations in several small streams downstream of coal mines were often an order of magnitude greater than the chronic guidelines currently used in Alberta.

Coal mining operations in Alberta are subject to pollution standards and emission limits established pursuant to the 1980 Clean Air Act and the 2000 Clean Water Act – says the Alberta law review. These acts point out that the limits are for 'point-specific' measures and do not provide for all appropriate measures. These limits leave wiggle room for mining operations that were not intended but have developed since the Acts were proclaimed.

Metis have much in common with all Albertans

Metis way of life depends on natural environments flourishing. This is also good for all Albertans. Increasingly, Albertans want to access wilderness, mountains, and foothills for fitness, for vacation and for an alternative to the urgent lifestyle we have.

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Finally

Pollution from coal and coal mining harms our health and our environment. Restoration of lands set aside for mining have in many cases taken so long to be completed, the initial destruction caused can never be fully compensated for.

In addition to affecting people's health, coal and coal mining reduce the ability of ecosystems to provide natural habitats that matter to people.

There are six first nation communities and 28 towns and cities opposed to the AB Government in its handling of the Coal Policy. We stand with them.

The way you conducted the meeting with MSGC is a positive sign that consultation can be done well. We thank you for your time and concern for how we live. We look forward to reading the final report and seeing the government response.

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Sincerely,

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